

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-md-02865-LAK

This document relates to:     The cases identified in  
Appendix A.

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**MOTION FOR ISSUANCE OF REQUESTS FOR INTERNATIONAL JUDICIAL  
ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK**

PLEASE TAKE NOTICE that the undersigned attorneys for the Defendants identified in Appendix A (collectively, “Defendants”), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of Requests for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Sharon L. McCarthy dated May 25, 2021 and the exhibits attached thereto.

Dated: New York, NY  
May 25, 2021

Respectfully submitted,

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*Plan, Monomer Industries LLC Roth 401(K)  
Plan, Limelight Global Productions LLC  
Roth 401(K) Plan, Loggerhead Services  
LLC Roth 401(K) Plan, PAB Facilities  
Global LLC Roth 401(K) Plan, Plumrose  
Industries LLC Roth 401(K) Plan, Pinax  
Holdings LLC Roth 401(K) Plan, Roadcraft  
Technologies LLC Roth 401(K) Plan,  
Sternway Logistics LLC Roth 401(K) Plan,  
Trailing Edge Productions LLC Roth 401(K)  
Plan, True Wind Investments LLC Roth  
401(K) Plan, Eclouge Industry LLC Roth  
401(K) Plan, Vanderlee Technologies  
Pension Plan, Vanderlee Technologies  
Pension Plan Trust, Cedar Hill Capital  
Investments LLC Roth 401(K) Plan, Green  
Scale Management LLC Roth 401(K) Plan,  
Fulcrum Productions LLC Roth 401(K)  
Plan, Keystone Technologies LLC Roth  
401(K) Plan, Tumba Systems LLC Roth  
401(K) Plan*

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## APPENDIX A

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Elizabeth van Merkensteijn		19-cv-01893
Azalea Pension Plan		19-cv-01893
Basalt Ventures LLC Roth 401(K) Plan		19-cv-01866
Bernina Pension Plan		19-cv-01865
Bernina Pension Plan Trust		19-cv-10713
Michelle Investments Pension Plan		19-cv-01906
Omineca Pension Plan		19-cv-01894
Omineca Trust		19-cv-01794 19-cv-01798 19-cv-01788 19-cv-01918 19-cv-01928 19-cv-01931

		19-cv-01800 19-cv-01803 19-cv-01809 19-cv-01818 19-cv-01801 19-cv-01810 19-cv-01813
Remece Investments LLC Pension Plan		19-cv-01911
Starfish Capital Management LLC Roth 401(K) Plan		19-cv-01871
Tarvos Pension Plan		19-cv-01930
Voojo Productions LLC Roth 401(K) Plan		19-cv-01873
Xiphias LLC Pension Plan		19-cv-01924
Richard Markowitz	Alan E. Schoenfield Wilmer Cutler Pickering Hale and Dorr LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8800 <a href="mailto:alan.schoenfeld@wilmerhale.com">alan.schoenfeld@wilmerhale.com</a>	19-cv-01867 19-cv-01895 19-cv-01869 19-cv-01868 19-cv-01898 19-cv-10713 19-cv-01896 19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Jocelyn Markowitz		19-cv-01904
Avanix Management LLC Roth 401(K) Plan		19-cv-01867
Batavia Capital Pension Plan		

Calypso Investments Pension Plan		19-cv-01895 19-cv-01904
Cavus Systems LLC Roth 401(K) Plan		19-cv-01869
Hadron Industries LLC Roth 401(K) Plan		19-cv-01868
RJM Capital Pension Plan		19-cv-01898
RJM Capital Pension Plan Trust		19-cv-10713
Routt Capital Pension Plan		19-cv-01896
Routt Capital Trust		19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
Rob Klugman	Mark D. Allison Caplin & Drysdale, Chartered 600 Lexington Avenue 21 <sup>st</sup> Floor New York, NY 10022 Tel: (212) 379-6000 <a href="mailto:mallison@capdale.com">mallison@capdale.com</a> <a href="mailto:zziering@capdale.com">zziering@capdale.com</a>	18-cv-07828 18-cv-07827 18-cv-07824 18-cv-07829 18-cv-04434
RAK Investment Trust		
Aerovane Logistics LLC Roth 401(K) Plan		18-cv-07828
Edgepoint Capital LLC Roth 401(K) Plan		18-cv-07827
Headsail Manufacturing LLC Roth 401(K) Plan		18-cv-07824
The Random Holdings		



401(K) Plan		18-cv-07829
The Stor Capital Consulting LLC 401(K) Plan		18-cv-04434
Joseph Herman	Michelle A. Rice Kaplan Rice LLP 142 West 57 <sup>th</sup> Street Suite 4A New York N.Y. 10019 (212) 333-0227 <a href="mailto:mrice@kaplanrice.com">mrice@kaplanrice.com</a>	1:19-cv-01785
		1:19-cv-01781
		1:19-cv-01791
		1:19-cv-01794
David Zelman		1:19-cv-01918
		1:19-cv-01783
		1:19-cv-01798
		1:19-cv-01788
		1:19-cv-01926
Edwin Miller		1:19-cv-01922
		1:19-cv-01928
		1:19-cv-01929
		1:19-cv-01931
		1:19-cv-01809
Ronald Altbach		1:19-cv-01800
		1:19-cv-01803
		1:19-cv-01812
		1:19-cv-01818
		1:19-cv-01806
Perry Lerner		1:19-cv-01870
		1:19-cv-01792
		1:19-cv-01808
		1:19-cv-01815
		1:19-cv-01801
Robin Jones		1:19-cv-01810
		1:19-cv-01813
Ballast Ventures LLC Roth 401(K) Plan		1:19-cv-01781
Bareroot Capital Investments LLC Roth 401(K) Plan		1:19-cv-01783
Albedo Management LLC Roth 401(K) Plan		

Dicot Technologies LLC Roth 401(K) Plan	1:19-cv-01785
Fairlie Investments LLC Roth 401(K) Plan	1:19-cv-01788
First Ascent Worldwide LLC Roth 401(K) Plan	1:19-cv-01791
Battu Holdings LLC Roth 401(K) Plan	1:19-cv-01792
Cantata Industries LLC Roth 401(K) Plan	1:19-cv-01794
Crucible Ventures LLC Roth 401(K) Plan	1:19-cv-01798
Monomer Industries LLC Roth 401(K) Plan	1:19-cv-01800
Limelight Global Productions LLC Roth 401(K) Plan	1:19-cv-01801
Loggerhead Services LLC Roth 401(K) Plan	1:19-cv-01803
PAB Facilities Global LLC Roth 401(K) Plan	1:19-cv-01806
Plumrose Industries LLC Roth 401(K) Plan	1:19-cv-01808
Pinax Holdings LLC Roth 401(K) Plan	1:19-cv-01809
Roadcraft Technologies LLC Roth 401(K) Plan	1:19-cv-01810
Sternway Logistics LLC Roth 401(K) Plan	1:19-cv-01812
Trailing Edge Productions LLC Roth 401(K) Plan	1:19-cv-01813

True Wind Investments LLC Roth 401(K) Plan  Eclouge Industry LLC Roth 401(K) Plan  Vanderlee Technologies Pension Plan  Vanderlee Technologies Pension Plan Trust  Cedar Hill Capital Investments LLC Roth 401(K) Plan  Green Scale Management LLC Roth 401(K) Plan  Fulcrum Productions LLC Roth 401(K) Plan  Keystone Technologies LLC Roth 401(K) Plan  Tumba Systems LLC Roth 401(K) Plan		1:19-cv-01815
		1:19-cv-01818
		1:19-cv-01870
		1:19-cv-01918
		1:19-cv-01918
		1:19-cv-01922
		1:19-cv-01926
		1:19-cv-01928
		1:19-cv-01929
		1:19-cv-01931
Michael Ben-Jacob	Thomas E. L. Dewey Dewey Pegno & Kramarsky LLP 777 Third Avenue – 37th Floor New York, New York 10017 Tel.: (212) 943-9000 Fax: (212) 943-4325 E-mail: <a href="mailto:tdewey@dpklaw.com">tdewey@dpklaw.com</a>	1:18-cv-04434 1:18-cv-07824 1:18-cv-07827 1:18-cv-07828 1:18-cv-07829 1:19-cv-01781 1:19-cv-01783 1:19-cv-01785 1:19-cv-01788 1:19-cv-01791 1:19-cv-01792 1:19-cv-01794 1:19-cv-01798 1:19-cv-01800 1:19-cv-01801 1:19-cv-01803

		1:19-cv-01806 1:19-cv-01808 1:19-cv-01809 1:19-cv-01810 1:19-cv-01812 1:19-cv-01813 1:19-cv-01815 1:19-cv-01818 1:19-cv-01866 1:19-cv-01867 1:19-cv-01868 1:19-cv-01869 1:19-cv-01870 1:19-cv-01871 1:19-cv-01873 1:19-cv-01894 1:19-cv-01896 1:19-cv-01918 1:19-cv-01922 1:19-cv-01926 1:19-cv-01928 1:19-cv-01929 1:19-cv-01931
Acer Investment Group LLC	John C. Blessington K&L GATES LLP State Street Financial Center One Lincoln Street Boston, MA 02111 T: 617.261.3100 F: 617.261.3175 E: <a href="mailto:john.blessington@klgates.com">john.blessington@klgates.com</a>	18-cv-09841 18-cv-09797 18-cv-09836 18-cv-09837 18-cv-09838 18-cv-09839 18-cv-09840 18-cv-10100 18-cv-05053
American Investment Group of New York, L.P. Pension Plan		18-cv-09841
DW Construction, Inc. Retirement Plan		18-cv-09797
Kamco Investments Inc. Pension Plan		18-cv-09836
Kamco LP Profit Sharing Pension Plan		18-cv-09837

Linden Associates Defined Benefit Plan		18-cv-09838
Moira Associates LLC 401K Plan		18-cv-09839
Newsong Fellowship Church 401K Plan		18-cv-10100
Riverside Associates Defined Benefit Plan		18-cv-09840
Robert Crema		18-cv-09841
Stacey Kaminer		18-cv-09841 18-cv-09797 18-cv-09836 18-cv-09837 18-cv-09839
Alexander Jamie Mitchell III		18-cv-10100
David Schulman		18-cv-09840
Joan Schulman		18-cv-09838
Darren Wittwer		18-cv-09797
John Doscas	Bryan C. Skarlatos	18-cv-4894
David Freelove	Eric Smith	18-cv-4899
Sterling Alpha LLC 401(K) Profit Sharing Plan	Kostelanetz & Fink, LLP 7 World Trade Center, 34th Floor New York, New York 10007 (212) 808-8100 (Office) (212) 808-8108 (Fax) bskarlatos@kflaw.com esmith@kflaw.com	18-cv-8655 18-cv-5374
Federated Logistics LLC 401(k) Plan		
Del Mar Asset Management & Retirement Plan		